

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
<b>v.</b>	:	<b>DATE FILED:</b> _____
	:	
<b>ARGENIS PACHECO MOSCOSO,</b>	:	<b>VIOLATIONS:</b>
a/k/a "Hennessey,"	:	
<b>ANGEL FERRER,</b>	:	<b>21 U.S.C. § 846</b>
a/k/a "Strange,"	:	<b>(conspiracy to distribute</b>
<b>JASON LOPEZ,</b>	:	<b>cocaine base ("crack") - 1 count)</b>
a/k/a Jonathon Davila,	:	<b>18 U.S.C. § 922(g)(1)(felon in possession</b>
a/k/a "JB,"	:	<b>of a firearm - 1 count)</b>
<b>CHRISTIAN DELGADO,</b>	:	<b>21 U.S.C. § 841(a)(1)</b>
a/k/a "Murder,"	:	<b>(possession with the intent to distribute</b>
a/k/a "Old C Murder,"	:	<b>cocaine base ("crack") - 3 counts)</b>
<b>DAVID NDUKA BOSAH,</b>	:	<b>21 U.S.C. § 860(a)(possession with the</b>
a/k/a "DJ,"	:	<b>intent to distribute cocaine base</b>
<b>JOSHUA BAEZ,</b>	:	<b>("crack") within 1000 feet of a</b>
a/k/a "Josh,"	:	<b>school - 2 counts)</b>
	:	<b>21 U.S.C. § 841(a)(1)</b>
	:	<b>(distribution of cocaine base</b>
	:	<b>("crack") - 3 counts</b>
	:	<b>21 U.S.C. § 860(a)</b>
	:	<b>(distribution of cocaine base</b>
	:	<b>("crack") within 1000 feet of</b>
	:	<b>school - 3 counts)</b>
	:	<b>21 U.S.C. § 853 (criminal forfeiture)</b>
	:	<b>18 U.S.C. § 2 (aiding and</b>
<b>abetting)</b>		

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about March 2003 through on or about August 2004, in

Reading, in the Eastern District of Pennsylvania and elsewhere, defendants

**ARGENIS PACHECO MOSCOSO,**  
**a/k/a “Hennessey,”**  
**ANGEL FERRER,**  
**a/k/a “Strange,”**  
**JASON LOPEZ,**  
**a/k/a “Jonathon Davila,”**  
**a/k/a “JB,”**  
**CHRISTIAN DELGADO,**  
**a/k/a “Murder,”**  
**a/k/a “Old C Murder,”**  
**DAVID NDUKA BOSAH,**  
**a/k/a “DJ,” and**  
**JOSHUA BAEZ,**  
**a/k/a “Josh”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute more than 50 grams, that is, approximately 30 kilograms, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**MANNER AND MEANS**

It was a part of the conspiracy that:

2. The Chestnut Street Gang (“CSG”) was a cocaine base (“crack”) distribution organization that operated in the South side of the City of Reading, Pennsylvania and included more than 10 members who purchased and sold more than \$3,000,000 of crack cocaine on a retail basis.

3. From on or about March 2003 to on or about August 2004, defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER managed and controlled the CSG and

the distribution of crack cocaine in the vicinity of Chestnut Street between 8th and 9th Streets and in the vicinity of Chestnut Street between 4th and 5th Streets in the City of Reading.

4. Defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER purchased cocaine and cocaine base (“crack”) from suppliers in New York and elsewhere. Others, at the direction of defendants MOSCOSO and FERRER, processed the cocaine into crack cocaine. Defendants MOSCOSO and FERRER then delivered the crack cocaine to other members of the CSG for distribution at the locations listed in paragraph 6.

5. Defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER caused the delivery of crack cocaine to members of the CSG in the vicinity of Chestnut Street between 8th and 9th Streets and in the vicinity of Chestnut Street between 4th and 5th Streets in the City of Reading.

6. Defendants JASON LOPEZ and CHRISTIAN DELGADO worked for the CSG and staffed, supervised, managed, controlled, led, and supplied the CSG locations listed below in the City of Reading with crack cocaine which members of the CSG sold to customers.

- 821 Chestnut Street;
- 421 Chestnut Street; and
- 814 Chestnut Street.

7. Defendants JASON LOPEZ and CHRISTIAN DELGADO were responsible for distributing bundles of crack cocaine, consisting of 28 packets of crack cocaine, to other members of the CSG, who sold the crack cocaine to customers at some of the CSG controlled locations listed in paragraph 6.

8. Defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER

employed various individuals, including defendants JASON LOPEZ, CHRISTIAN DELGADO, DAVID NDUKA BOSAH and JOSHUA BAEZ, and other adults and a juvenile known and unknown to the grand jury as sellers of crack cocaine at the CSG locations listed in paragraph 6.

9. To protect the CSG operation and the CSG locations, and to prevent the theft of crack cocaine sold by the CSG, members of the CSG, including defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER, used and carried firearms.

10. Defendants JASON LOPEZ, CHRISTIAN DELGADO, DAVID NDUKA BOSAH and JOSHUA BAEZ were paid from the proceeds of CSG crack cocaine sales to customers as follows: street sellers were paid \$80 for each bundle of 28 \$10 packets they sold and a supervisor was paid \$400 for every 5 bundles of 28 \$10 packets that were sold.

11. Defendants ARGENIS PACHECO MOSCOSO, ANGEL FERRER, JASON LOPEZ, DAVID NDUKA BOSAH, JOSHUA BAEZ and CHRISTIAN DELGADO routinely carried and used cellular phones to speak with other members of the CSG.

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, were performed in Reading, in the Eastern District of Pennsylvania, and elsewhere:

1. In or about March 2003, defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER established a crack cocaine distribution operation in the area of Chestnut Street between 8th and 9th Streets and in the vicinity of Chestnut Street between 4th and 5th Streets in Reading, Pennsylvania.

2. In or about March 2003, defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER agreed to supply crack cocaine to Person #1, a person known to the grand jury, to be distributed in the area of 821 Chestnut Street in Reading, Pennsylvania.

3. On or about November 2, 2003, defendant ANGEL FERRER possessed a firearm, that is, a loaded Smith & Wesson, .38 caliber handgun, serial number 15D9223.

4. On or about June 16, 2004, defendant ARGENIS PACHECO MOSCOSO delivered 1 bag containing .37 grams of crack cocaine to an undercover detective.

5. On or about June 23, 2004, at the direction of defendant ARGENIS PACHECO MOSCOSO, person #1 delivered 12 bags containing .98 grams of crack cocaine to an undercover detective.

6. On or about July 9, 2004, at the direction of defendant ARGENIS PACHECO MOSCOSO, person #2, a person known to the grand jury, delivered 12 bags containing .86 grams of crack cocaine to an undercover detective.

7. On or about July 21, 2004, at the direction of defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER, defendant JOSHUA BAEZ possessed approximately 1.7 grams of crack cocaine for sale in the 800 block of Chestnut Street in Reading, Pennsylvania.

8. On or about July 21, 2004, defendants ARGENIS PACHECO MOSCOSO and ANGEL FERRER possessed approximately 11.83 grams of crack cocaine for sale in the 400 block of Chestnut Street in Reading, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 2, 2003, in Reading, in the Eastern District of  
Pennsylvania, defendant

**ANGEL FERRER,  
a/k/a "Strange,"**

having been convicted in a Court of the Commonwealth of Pennsylvania of an offense punishable  
by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate  
and foreign commerce, a firearm, that is a Smith & Wesson, .38 caliber handgun, serial number  
15D9223, loaded with 6 rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 15, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
ANGEL FERRER,  
a/k/a "Strange,"  
and  
JOSHUA BAEZ,  
a/k/a "Josh,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 grams, that is approximately 7.9 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 16, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendant

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 16, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School located at 300 Chestnut Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a “Hennessey,”  
and  
ANGEL FERRER,  
a/k/a “Strange,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),  
and Title 18, United States Code, Section 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 23, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School located at 300 Chestnut Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 9, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),  
and Title 18, United States Code, Section 2.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 9, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle located at 300 Chestnut Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 21, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 grams, that is approximately 11.83 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B),  
and Title 18, United States Code, Section 2.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 21, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 grams, that is approximately 11.83 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southwest Middle School located at 300 Chestnut Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 21, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the  
possession with intent to distribute of, a mixture or substance containing a detectable amount of  
cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),  
and Title 18, United States Code, Section 2.



**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 21, 2004, in Reading, in the Eastern District of Pennsylvania,  
defendants

**ARGENIS PACHECO MOSCOSO,  
a/k/a "Hennessey,"  
and  
ANGEL FERRER,  
a/k/a "Strange,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Southern Middle School located at 931 Chestnut Street, Reading, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

### **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1) and 860(a) charged in this indictment, defendants ARGENIS PACHECO MOSCOSO, ANGEL FERRER, JASON LOPEZ, CHRISTIAN DELGADO, DAVID NDUKA BOSAH and JOSHUA BAEZ, shall forfeit to the United States of America:

a. any property constituting or derived from proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code, as charged in this indictment; and

b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, Sections 846, 841(a)(1), and 860(a) charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property subject to forfeiture.

All pursuant to Title 21, United States Code, Sections 853.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**